

Before the  
**Federal Communications Commission**

Washington, D.C. 20554

**RECEIVED**

JUN 24 1997  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of ) MM Docket No. 97-116  
) RM-9050  
Amendment of Section 73.202(b) ) RM-\_\_\_\_\_  
(Table of Allotments) )  
FM Broadcast Stations )  
)  
Everglades City, LaBelle, Estero )  
and Key West, Florida )

DOCKET FILE COPY ORIGINAL

To: Chief, Mass Media Bureau  
Policy and Rules Division  
Allocations Branch

**REPLY COMMENTS**  
**OF**  
**INTERMART BROADCASTING WEST COAST, INC.**

Gary S. Smithwick  
SMITHWICK & BELENDIUK, P.C.  
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June 24, 1997

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## SUMMARY OF FILING

InterMart Broadcasting West Coast, Inc. ("InterMart"), licensee of WKZY(FM), LaBelle, Florida, hereby responds to filings made by Keith L. Reising ("Reising") who has requested the allotment of Channel 224A to Everglades City, Florida, as its first local service. InterMart, on June 9, 1997, timely filed a counterproposal seeking to reallocate Channel 223C3 from LaBelle to Estero, Florida, with the modification of WKZY's license to operate on Channel 223C3 at Estero. It will also be necessary to change the channel of WEOW, Channel 223C1 to operate on Channel 224C1 at Key West, Florida. InterMart has expressed its continued interest in the channel and has agreed to reimburse the licensee of WEOW for its reasonable costs involved in the channel change.

InterMart shows herein that Reising's entire proposal and all the papers he has filed may not be considered since they are not verified as required by Section 1.52 of the Rules.

In the event the Commission ignores its rules and considers Reising's proposal on the merits, InterMart shows herein that its proposal is greatly preferred to Reising's. This is based on the facts that (a) Everglades City is a "quiet village" that does not justify allotment of its own local station, (b) Channel 223C3 at Estero would provide first local service to Estero and first local service at Bayshore, Florida, by resolving a mutually-exclusive situation between applications for WKZY at LaBelle and a new noncommercial educational FM station at Bayshore, Florida, and (c) allotment of Channel 223C3 to Estero is preferred under the Commission's allotment criteria.

InterMart shows that its proposal is based on rare circumstances that justify the removal of Channel 223C3 from LaBelle even before a pending new noncommercial educational station application is granted for LaBelle.

InterMart also provides declarations from individuals involved in Estero business and civic organizations that urge the Commission to allot Channel 223C3 to Estero as its first local service.

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To: Chief, Mass Media Bureau		
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**REPLY COMMENTS**  
**OF**  
**INTERMART BROADCASTING WEST COAST, INC.**

InterMart Broadcasting West Coast, Inc. ("InterMart"), licensee of WKZY(FM), LaBelle, Florida, by its attorneys, and pursuant to Section 1.420(d) of the Commission's Rules, hereby respectfully files its reply comments pursuant to the Commission's *Notice of Proposed Rule Making ("NPRM")*, DA 97-716, released April 18, 1997,<sup>1</sup> that proposes to allot Channel 224A to Everglades City, Florida, as its first local service. InterMart, on June 9, 1997, requested the Commission to deny Keith L. Reising's ("Reising") proposal to allot Channel 224A to Everglades City, and instead, amend Section 73.202(b) of the Rules to (a) delete Channel 223C3 from LaBelle, Florida; (b) add Channel 223C3 to Estero, Florida; (c) modify the license for

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<sup>1</sup> Reply comments are due by June 24, 1997, so these Reply Comments are timely filed.

WKZY(FM), LaBelle, to specify "Estero, Florida" as the Station's community of license, and (d) modify the license of WEOW(FM), Channel 223C1, Key West, Florida, to operate on Channel 224C1 at Key West. Reising submitted a paper dated May 8, 1997, which the Commission received May 12, 1997, and another paper dated June 16, 1997.<sup>2</sup> It is to those papers that InterMart responds. For the reasons set forth herein, Reising's proposal to allot Channel 224A to Everglades City, Florida, must be dismissed, and as InterMart's counterproposal is the only other proposal properly before the Commission in this docket, it should be granted. Even if the Commission were to further consider Reising's proposal, the evidence indicates that InterMart's proposal to reallocate Channel 223C3 to Estero is preferred under Commission precedent. In support of its proposal, InterMart shows the following:

I

**Reising's Petition for Rule Making**  
**and**  
**His Filings of May 12, 1997, and June 16, 1997,**  
**Must Be Rejected for Violation of the Rules**

1. Examination of Reising's "Petition for Rule Making" filed March 6, 1997, Reising's letter filed on May 12, 1997, and his letter dated June 16, 1997, reveals that none of the documents comply with Section 1.52 of the Commission's Rules, and as a result may not be considered by the Commission. That Rule requires that the original of any document filed with the Commission by a party not represented by counsel shall be signed and verified by the party and his/her address stated.

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<sup>2</sup>Copy received by counsel June 23, 1997.

Reising's March 6, 1997, petition for rule making is accompanied only by the following:

"CERTIFICATION: I hereby Certify that the information contained in this Petition is true and correct to the best of my knowledge."

That language does not satisfy the requirements of Section 1.52, which requires that a document not submitted by counsel be "verified." Verification means that the document must satisfy the requirements of Section 1.16 of the Rules which provides in pertinent part as follows:

Any document to be filed with the Federal Communications Commission and which is required by any law, rule or other regulation of the United States to be supported, evidenced, established or proved by a written sworn declaration, **verification**, certificate, statement, oath or affidavit by the person making the same, may be supported, established or proved by the unsworn declaration, certification, verification, or statement in writing...of such person. Such declaration shall be **subscribed by the declarant as true under penalty of perjury**, and dated, in substantially the following form:

(1)\*\*\*

(2)If executed within the United States, its territories, possessions, or commonwealths: "I declare (or certify, verify or state) **under penalty of perjury** that the foregoing is true and correct. Executed on (date).(Signature).

2. Although Reising's petition for rule making contains a paragraph labeled "certification," it is not submitted "under penalty of perjury," and is not accompanied by an affidavit of a notary public. As it was not submitted by an attorney, it must be disregarded by the Commission. Reising's letter filed May 12, 1997, and his letter dated June 16, 1997, contain neither a verification, nor an affidavit. In light of this defect, both the petition and the letters must be disregarded, and no channel may be allotted to Everglades City.

3. In *Latta, Marion, Camden and Blythewood, South Carolina*, 10 FCC Rcd 7204, Note 3 (1995), the Chief, Allocations Branch, dismissed a counterproposal that had been inadvertently placed on public notice even though it failed to include an affidavit. The Commission said: "Section 1.402(b) of the Commission's Rules concerning rule making proceedings places petitioners on notice that their proposals must conform with the requirements of Section 1.52 regarding subscription and verification." The Commission rejected the petitioner's attempt after the reply comment period closed to correct the omission on the ground that the Commission's rules do not contemplate the filing of pleadings beyond the comment and reply periods specified in the notice of proposed rule making. Therefore, any last-ditch attempt by Reising to cure the defect post June 24, 1997, would be rejected.

4. In *Amendment of Sections 1.420 and 73.3584 of the Commission's Rules Concerning Abuses of the Commission's Processes*, 5 FCC Rcd 3911, 3919, Note 41 (1990), the Commission stated that the rules concerning Section 1.52 should be strictly enforced in allocation proceedings.<sup>3</sup>

5. As noted *supra*, Reising filed a letter ("Reising Opposition") to the Secretary of the Commission that purports to be an "opposition" to InterMart's counterproposal. The merits of the Reising Opposition are discussed *infra*. Since Reising failed to properly verify either his petition for rule making, his letter dated May 12, 1996, or the Reising Opposition, his proposal to allot Channel 224A to Everglades City, Florida, must be dismissed. The Commission should consider the Everglades

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<sup>3</sup>Additionally, the Reising Opposition does not list Reising's address, also in violation of Section 1.52.



City allotment as one for which no expression of interest has been filed, and refrain from allotting a channel as is the Commission's policy. *Hubbardston, Michigan*, DA 97-1273, released June 20, 1997.

## II

### **Comparison of Estero and Everglades City**

#### **A. Everglades City, Florida**

6. If the Commission ignores its rules and considers Reisling's proposal, InterMart's proposal to reallocate Channel 223C3 from LaBelle to Estero, Florida, is preferred over Reisling's proposal to allocate Channel 224A to Everglades City.

7. Reising's proposal should be rejected because Everglades City appears to be nothing more than a "quiet village" which has no need for its own local transmission service. See *Scranton and Surfside Beach, South Carolina*, 3 FCC Rcd 2798, 2799 (1988) and *Debra D. Carrigan*, 58 RR 2d 96 at 104 (1985). Although the "quiet village" cases typically include additional elements (*i.e.*, population under 1000, the signals of any and all competing applicants would cover the community, and the larger competing communities would have a far greater public interest need for a first competitive aural service than the quiet village), Everglades City still should be deemed a "quiet village" for allotment purposes, and no channel should be allotted to it. Everglades City has a declining population of only 321 people (1990 census) down from 524 in the 1980 census. Everglades City is already well served, receiving service (1.0 mV/m for FM and .5 mV/m for AM) from 13 AM and 4 FM stations. It clearly does not have a need for its own transmission service.

8. Although the Commission establishes a presumption of community status based on a listing in the U.S. Census or incorporation, that presumption can be rebutted. See *Klamath Falls, Altamont and Butte Falls, Oregon, and Dorris, California*, 10 FCC Rcd 7583 (1995) where the Commission declined to allot a channel to Butte Falls, an incorporated place with a population of only 252 persons because the petitioner did not provide community information beyond stating that Butte Falls was incorporated with its own local government. Butte Falls and Everglades City are remarkably similar and neither justify the allotment of an FM channel.

#### **B. Estero, Florida**

9. In marked contrast to Everglades City, InterMart showed in its timely-filed counterproposal that Estero is a Census Designated Place which had a 1990 population of 3,177, with its own U. S. Post Office and ZIP Code, i.e., 33928. Thus, while a presumption exists that Estero has community status, InterMart also showed that Estero has commercial businesses such as outdoor outfitters and retail businesses, its own fire station and rescue squad, churches, and recreational facilities such that Estero possesses the requisite "social, economic and cultural components that are commonly associated with community status." *See, FM Table of Allotments (East Hemet, CA)*, 67 RR 2d 146, 147 (1989).

10. The Reising Opposition argues against reallocating Channel 223C3 to Estero on seven separate grounds, discussed *infra*, none of which are supported by the facts or the law.

A. InterMart's proposal is not contrary to what Reising calls the FCC's policy of not allowing a "move-in" from a small city to a large city. InterMart

assumes Reising is referring to the *Tuck* doctrine.<sup>4</sup> In its Counterproposal, InterMart showed that from the allocation site, the proposed city grade contour of a maximum Class C3 station would cover only approximately 46% of the Naples, Florida, Urbanized Area, and about 5% of the Fort Myers-Cape Coral Urbanized Area. That showing should moot any concerns under *Tuck*.

B. InterMart's proposal would not deny LaBelle its own radio station since Toccoa Falls College has applied for a new noncommercial educational FM station at LaBelle ("TFC Application"). Without citing any authority, Reising claims that the proposed new station cannot be considered. On the contrary, in *Modification of FM and TV Authorizations to Specify a New Community of License ("Change of Community")*, 5 FCC Rcd 7094, 7097 (1990), the Commission said that the replacement of an operating station with an unconstructed permit is a factor to be considered in favor of a proposal, although it does not cure the disruption of "existing service." In the case of WKZY, the residents of LaBelle will not experience any meaningful disruption to existing service. WKZY is off the air pursuant to special temporary authority. WKZY was off the air from February 25, 1994, until February 6, 1997, when it signed on with interim Class A facilities. On January 16, 1997, the Commission issued WKZY a Class A interim construction permit after the Commission rescinded its Class C3 construction permit on January 3, 1997. Attachment A is a copy of the Commission's letter rescinding the grant. The rescission was necessary, in the Commission's view, because of a prior-filed application for a new noncommercial

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<sup>4</sup>*Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988).

educational FM station to serve Bayshore, Florida as its first local service.<sup>5</sup> On March 15, 1997, WKZY again went silent and is now silent pursuant to special temporary authority. So the residents of LaBelle have not, except for a short period last February and March, had local service from WKZY since February 1994. And because of the interim nature of the Class A facilities available to WKZY, future service would be greatly limited. Under such rare circumstances, the Commission should not insist on the initiation of service at LaBelle before reallocating Channel 223C3 to Estero.

C. Although InterMart believes the TFC Application meets the Commission's requirements in not removing the community's sole local broadcast service, in *Change of Community, supra*, the Commission stated that it would consider a waiver of the ban on removing the sole local service in the "rare circumstances" where removal might serve the public interest. In the case of InterMart's proposal, removal of Channel 223C3 at LaBelle would be a temporary situation in view of the pendency of the TFC Application. Grant of InterMart's counterproposal (and any requisite waiver of the local service policy) would permit the initiation of first local service to Estero, a community significantly larger than LaBelle; would permit the favorable resolution of potential mutually exclusive applications (LaBelle v. Bayshore, Florida); and would permit the initiation of first local service to Bayshore. These are indeed, the "rare circumstances" that justify waiver of the Commission's ban and show that reallocation of Channel 223C3 to Estero would serve the public interest.

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<sup>5</sup>Community Resource Foundation, Inc. (File No. BPED-960826MK).

D. Reising is wrong when he argues that the TFC Application for LaBelle would be an inferior service when compared to the existing service of WKZY. Attachment B is a Technical Statement prepared by InterMart's technical consultants demonstrating that Reising failed to note that both the TFC Application and WKZY provide city grade service to LaBelle, and that Reising made an incorrect comparison showing the TFC Application distance to the 60 dBu and 70 dBu contours as smaller than the WKZY existing service. WKZY's interim Class A facilities on Channel 223 are for 6 kW with antenna center of radiation at 49 meters above average terrain, while InterMart's Class C3 construction permit was rescinded as discussed above because of mutual exclusivity with the Bayshore application. WKZY has only a 11.5 km 70 dBu contour and a 20.6 km 60 dBu contour. This signal compares with the TFC Application distances of 10.9 km and 19.2 km, respectively, an insignificant difference.

E. Further, Reising claims that Estero already has a radio station, WJBX, Fort Myers Beach, Florida, and that Estero and Fort Myers Beach are geographically parts of each other. However, again, Reising is wrong. Service to Fort Myers Beach is not service to Estero. Reising has apparently confused Estero **Island** with the community of Estero. Attachment B, Exhibit 1 shows that **Estero** (community) is 14 km from **Estero Island and Fort Myers Beach**.

F. Reising also misstates the level of service available to Everglades City (one city-grade AM and one city-grade FM service.) Attachment B shows that the primary service contours must be considered (rather than city-grade) for the service analysis, and that Everglades City receives service from 13 AM and 4 FM stations.

G. In sum, none of Reising's arguments in the Reising Opposition are apposite, and if his paper is considered (in light of the Section 1.52 violation), the arguments therein should be rejected.

### III

#### **Additional Public Interest Reasons to Reallot Channel 223C3 to Estero**

11. There is significant local public support for the reallocation of Channel 223C3 to Estero as its first local service. Attachment C consists of declarations under penalty of perjury from persons representing local businesses, a church and a civic organization. The declarants state that they operate a business (or civic organization) in Estero that identifies with Estero and intends to serve the needs of Estero as opposed to other communities in the vicinity. Their belief is stated that a local radio station would be of great benefit to the residents of Estero who do not now have any form of mass media for local expression. The declarants urge the Commission to allot the new FM channel to Estero. Business persons providing declarations include Paula Stuller of Estero River Outfitters; Jo Bigelow of the Koreshan Unity Foundation, Inc.; Sean C. Liebler of Tropic Trailer - Mid Island Marina; Fred M. Browning and Versic VanCleve of Estero Realty, Inc.; Syed Khaliq of the Estero Market; Larry Milford of Rustic Furniture; John Greising of Campbell's Auto Center; Michael H. Yarling of Estero RV Center, Inc.; Julie Block of A Sharper Image Hair Design; Gregory P. Jones of Jones RE Management; Colin and Carol Brady of The Foot-Print. A declaration is submitted from Bill Fisackerly IV of the Estero United Methodist Church and a second declaration is submitted from Jo Bigelow, a board member of the Estero Civic Association.

12. Attachment D is a copy of an article that appeared in the May 31, 1997, edition of the *News-Press* newspaper concerning the efforts of local Estero residents to establish in Estero its own Chamber of Commerce. The article cites Jo Bigelow, a declarant herein, who says "...we don't want Estero to be forgotten. We've been on the map since 1841."

13. The evidence reveals a clear nexus between the political, social and commercial organizations and Estero. This conclusion is supported not only by census data, but testimony from persons with first-hand knowledge that shows that the residents function as and conceive of themselves as residents of Estero, around which their interests coalesce.

14. As set out in InterMart's Counterproposal, but worth repeating here, the Commission's priorities for assigning FM allotments are set out in *Revision of FM Assignment Policies and Procedures, supra*. They are: (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). First local service to Estero is greatly preferred to first local service to Everglades City or LaBelle because of Estero's greater population, and the resolution of the potential mutual exclusivity with BPED-960826MK would permit the allotment of first local service to Bayshore, Florida. Thus, there would a preferential arrangement of allotments resulting from the allotment of Channel 223C3 to Estero.

WHEREFORE, InterMart respectfully requests the Commission to reject Reising's proposal as in patent violation of Section 1.52, to not consider it further, and

to adopt the only proposal legally before the Commission, *i.e.*, to amend Section 73.202(b) of the Commission's Rules, as follows:

	<u>Florida</u>	
	<u>Present</u>	<u>Proposed</u>
Everglades City	None	None
LaBelle	223C3	(202A) <sup>6</sup>
Estero	None	223C3
Key West	223C1	224C1

#### IV

#### Conclusion

InterMart requests the Commission to issue a Report and Order that (a) rejects as inadvertently accepted, Reising's proposal to allot a new FM channel to Everglades City, and instead (b) requires the licensee of WEOW(FM), Key West, Florida, to show cause why the Commission should not modify the license of WEOW(FM) to operate on Channel 224C1, (c) allots Channel 223C3 to Estero, Florida, and (d) modifies the license of WKZY to operate on FM Channel 223C3 at Estero, Florida. As stated in InterMart's Counterproposal, if the FCC modifies the license of WKZY to operate on Channel 223C3 at Estero, InterMart will timely file an application for minor change construction permit to operate WKZY at Estero, and upon grant thereof, InterMart will construct the new facilities and operate them; and will reimburse the license of WEOW-FM for its reasonable costs associated with the channel change.

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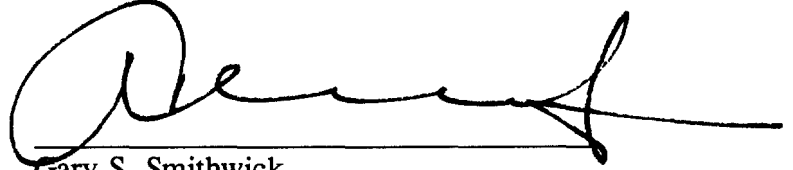
<sup>6</sup>Application pending for construction permit on this channel.



Respectfully submitted,

**INTERMART BROADCASTING  
WEST COAST, INC.**

By:

A handwritten signature in black ink, appearing to read 'G. Smithwick', written over a horizontal line.

Gary S. Smithwick  
Its Attorney

**SMITHWICK & BELENDIUK, P.C.**

1990 M Street, N.W.

Suite 510

Washington, D.C. 20036

(202) 785-2800

June 24, 1997

**ATTACHMENT A**

**FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

**JAN 03 1997**

IN REPLY REFER TO:  
1800B3-JRG

Gary S. Smithwick, Esq.  
Smithwick & Belendiuk, P.C.  
1990 M Street, N.W., Suite 510  
Washington, D.C. 20036

Ms. Melody A. Oie, President  
Community Resource Foundation, Inc.  
79 Evergreen Avenue  
Elmira, NY 14905

In re: WKZY(FM), LaBelle, FL  
InterMart Broadcasting West Coast, Inc.  
BMPH-960829IB

NEW(FM), Bayshore, FL  
Community Resource Foundation, Inc.  
BPED-960826MK

Dear Applicants:

The staff has before it the above-captioned applications filed by: (i) InterMart Broadcasting West Coast, Inc. ("InterMart") to modify the facilities specified in permit BPH-950813IA; and (ii) Community Resource Foundation, Inc. ("Community") requesting a construction permit for a new NCE-FM station to serve Bayshore, Florida.

**Background**

On August 26, 1996, Community filed its noncommercial major change application (BPED-960826MK) for a new NCE-FM station to serve Bayshore, Florida on Channel 220A. On August 29, 1996, InterMart filed its commercial minor change application (BMPH-960829IB) to modify the facilities specified in permit BPH-950813IA. InterMart's application requested expedited processing because WKZY was a "silent station" which would lose its operating authority if it did not return to the air by February 8, 1997. When the staff performed its engineering study on InterMart's application, Community's application had not been entered into the Commission's engineering database. On December 4, 1996, finding no conflict with any earlier filed application, the staff granted InterMart's application. On December 19, 1996, the staff commenced processing of Community's application and discovered it to be in conflict with InterMart's granted application. Since Community's application was filed before InterMart's application and they conflict, they are considered to be mutually exclusive. Therefore, the grant of InterMart's application was erroneous.

**Conclusion**

In light of the above, the December 4, 1996 grant of InterMart's application (BMPH-960829IB) IS HEREBY RESCINDED and the application is returned to pending status. Processing of Community's application will continue. This action is taken pursuant to 47 C.F.R. § 0.283.

Sincerely,

A handwritten signature in black ink that reads "Dennis Williams". The signature is written in a cursive style with a large, stylized 'D' and 'W'.

Dennis Williams  
Assistant Chief  
Audio Services Division  
Mass Media Bureau

cc: InterMart Broadcasting West Coast, Inc.

**ATTACHMENT B**

**REPLY COMMENTS**  
**MM Docket No. 97-116, RM-9050**  
**Intermart Broadcasting West Coast, Inc.**  
**Estero, Florida**  
**June 1997**

These Technical Reply Comments on behalf of Intermart Broadcasting West Coast, Inc. ("Intermart") are in response to the opposition to the Counter Proposal filed by Keith Reising ("Reising") petitioner for Channel 224A at Everglades City, Florida.

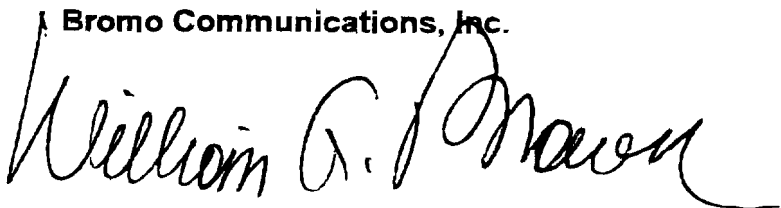
Reising states in his opposition that the application by Toccoa Falls College for Channel 202A would be inferior service when compared to the existing WKZY service. He failed to admit that both the Channel 202A and WKZY provide city grade service (70 dBu) coverage of the entire community of LaBelle. Reising also makes a wrongful comparison when he shows the Channel 202A distance to the 60 and 70 dBu contours is smaller than the WKZY existing service. WKZY currently operates (CP with license application pending) on Channel 223 as a Class A station (6 kW at 49 meters HAAT). Intermart has only an application for Channel 223C3 pending FCC approval. WKZY has a pending application for Channel 223C3 (BMPH-960829IB), however, that application is mutually exclusive with an application for Channel 219A by Community Resource Foundation at Bay Shore, Florida (BPED-960826MK). Therefore, if a comparison should be made it should be between two Class A stations. WKZY currently has a 11.5 km 70 dBu contour and a 20.6 km 60 dBu contour. This signal compares to the Channel 202A application of 10.9 and 19.2 km respectively, hardly enough difference to even mention.

Reising states "Estero, Florida already has a local radio station, WJBX, 99.3 mHz, 50,000 Watts, which is licensed to the community of Fort Myers Beach, FL." He

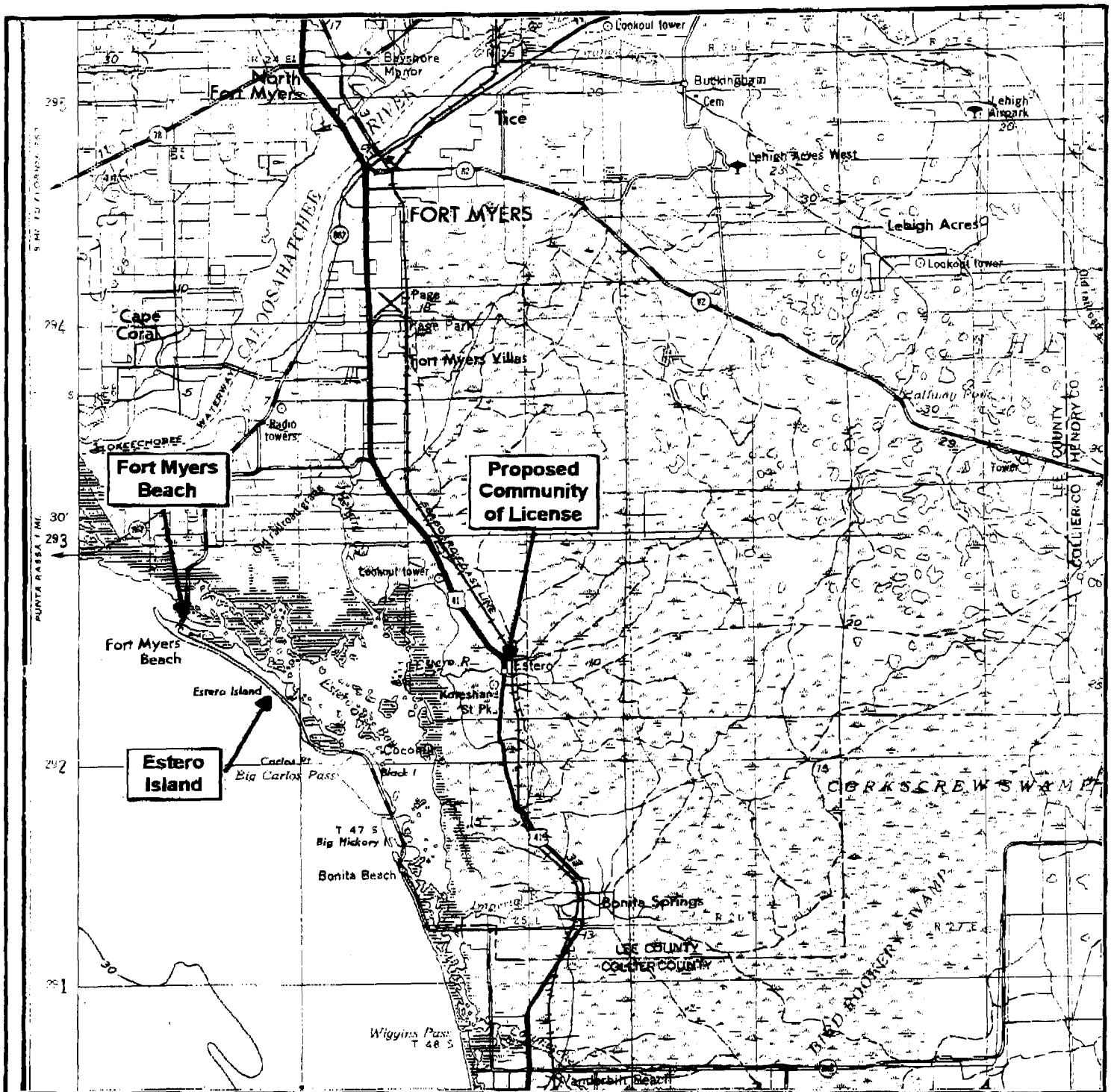
went on to state that "...Fort Myers Beach is a geographic part of Estero or vice versa..." and "...one cannot tell when you have left one and entered the other." Fort Myers Beach is located on and is an integral part of Estero Island. However, the Intermart Counter Proposal provides service to the community of Estero, a census designated place. Estero is located 14 km from Fort Myers Beach (*See the enclosed Exhibit #1*). The communities are not only separated by distance but also by a large body of water. Therefore, we do not understand the statement "...one cannot tell when you have left one and entered the other."

In the opposition it was stated that only one FM and one AM provide "city grade" service to Everglades City. For service comparison the Commission uses the primary contour 1.0 mV/m for FM and .5 mV/m for AM stations. We have shown in the Intermart Counter Proposal where Everglades City receives service from 13 AM and 4 FM stations.

Bromo Communications, Inc.

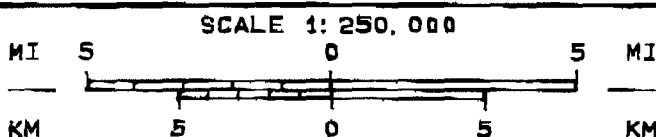
A handwritten signature in black ink, appearing to read "William G. Brown". The signature is fluid and cursive, with a large, stylized "W" and "B".

William G. Brown



### Clarification of Location of Estero, Florida

Map is State of Florida  
West Palm Beach (NG 17-5)  
Scale 1:250,000  
US Geological Survey



### EXHIBIT #1

Reply Comments  
MM Docket No. 97-116, RM-9050  
Intermart Broadcasting  
West Coast, Inc.  
Estero, Florida  
June 1997

**BROMO** BROADCAST  
COMMUNICATIONS TECHNICAL CONSULTANTS



**ATTACHMENT C**